

1 NIALL P. McCARTHY (SBN 160175)
 2 TYSON C. REDENBARGER (SBN 294424)
 3 GRACE Y. PARK (SBN 239928)
 4 COTCHETT, PITRE & McCARTHY, LLP
 5 San Francisco Airport Office Center
 6 840 Malcolm Road
 7 Burlingame, CA 94010
 Telephone: (650) 697-6000
 Facsimile: (650) 697-0577
 Email: nmccarthy@cpmlegal.com
 tredenbarger@cpmlegal.com
 gpark@cpmlegal.com

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*10 Attorneys for Plaintiffs Sierra Club, Inc.,
 11 Surfrider Foundation, Inc., Heal the Bay,
 12 Inc., and Baykeeper, Inc.*

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 SIERRA CLUB, INC.,
 14 SURFRIDER FOUNDATION, INC.,
 HEAL THE BAY, INC., and
 BAYKEEPER, INC., each a California
 Nonprofit,

CASE NO. 3:24-cv-07288-RS

JOINT STIPULATION AND [PROPOSED]
 ORDER RELATING CASES

15 Plaintiffs,

16 v.

17 EXXONMOBIL CORPORATION, a New
 Jersey Corporation, and DOES 1-10,

18 Defendants.

1 Pursuant to Civil Local Rules 3-12, 7-11, and 7-12, the parties, by and through their
 2 undersigned counsel, stipulate and agree as follows:

3 On September 23, 2024, *Sierra Club, Inc., et al. v. ExxonMobil Corporation*, Case No.
 4 CGC 24-618321 (“Non-Profits’ action”) was filed in California Superior Court, San Francisco
 5 County. On October 18, 2024, defendant Exxon Mobil Corporation (“ExxonMobil”) removed the
 6 Non-Profits’ action to this Court, which was then designated as Case No. 3:24-cv-07288-RS.

7 Also on September 23, 2024, *People of the State of California, ex rel. Rob Bonta, Attorney
 8 General of California v. Exxon Mobil Corporation*, Case No. CGC 24-618323 (“California AG’s
 9 action”) was filed in California Superior Court, San Francisco County. On November 1, 2024,
 10 ExxonMobil removed the California AG’s action to this Court, which is currently designated as
 11 Case No. 4:24-cv-07594-HSG.

12 Both cases assert similar legal claims, involve the same defendant, are based on similar
 13 alleged events, and will involve an overlap in discovery. *See* Civil Local Rule 3-12(a)(1). As
 14 such, there is or may be likelihood “that there will be an unduly burdensome duplication of labor
 15 and expense or conflicting results if the cases are conducted before different Judges.” *See* Civil
 16 Local Rule 3-12(a)(2).

17 This stipulation is not intended to operate as an admission of any factual allegation or legal
 18 conclusion and is submitted subject to and without waiver of any right, claim, defense, affirmative
 19 defense, or objection, including personal or subject matter jurisdiction.

20 **ACCORDINGLY, THE PARTIES STIPULATE AND AGREE, that:**

- 21 1. Case No. 4:24-cv-07594-HSG shall be reassigned to the Hon. Richard Seeborg and
 22 shall be designated as Case No. 3:24-cv-07594-RS.
- 23 2. Any case management conference in any reassigned case will be rescheduled by
 24 the Court.

25 Dated: November 11, 2024

26 By: /s/ Grace Y. Park
 27 NIALL P. McCARTHY (SBN 160175)
 28 TYSON C. REDENBARGER (SBN 294424)
 GRACE Y. PARK (SBN 239928)
 COTCHETT, PITRE & McCARTHY, LLP
 San Francisco Airport Office Center
 840 Malcolm Road

1 Burlingame, CA 94010
 2 Telephone: (650) 697-6000
 3 Facsimile: (650) 697-0577
 4 Email: nmccarthy@cpmlegal.com
 tredenbarger@cpmlegal.com
 gpark@cpmlegal.com

5 *Attorneys for Plaintiffs Sierra Club, Inc.,
 6 Surfrider Foundation, Inc., Heal the Bay, Inc.,
 7 and Baykeeper, Inc.*

8 Dated: November 11, 2024

9 By: /s/ Gabriel R. Martinez

10 ROB BONTA
 11 Attorney General of California
 12 DANIEL A. OLIVAS (SBN 130405)
 13 Senior Assistant Attorney General
 14 DEBORAH M. SMITH (SBN 208960)
 15 VANESSA C. MORRISON (SBN 254002)
 16 Supervising Deputy Attorneys General
 17 JUSTIN J. LEE (SBN 307148)
 18 ANGELA T. HOWE (SBN 239224)
 19 KATHERINE C. SCHOON (SBN 344195)
 20 GABRIEL R. MARTINEZ (SBN 275142)
 21 Deputy Attorneys General
 22 300 S. Spring Street, Suite 1702
 23 Los Angeles, CA 90013-1230
 24 Telephone: (213) 269-6000
 25 Facsimile: (916) 731-2121
 26 Email: Justin.Lee@doj.ca.gov
 Angela.Howe@doj.ca.gov
 Katherine.Schoon@doj.ca.gov
 Gabriel.Martinez@doj.ca.gov

27 *Attorneys for Plaintiff, People of the State of
 28 California, ex rel. Rob Bonta, Attorney General
 of California*

20 Dated: November 11, 2024

21 By: /s/ Matthew R. Cowan

22 DAWN SESTITO (SBN 214011)
 23 MATTHEW R. COWAN (SBN 281114)
 24 O'MELVENY & MYERS LLP
 25 400 South Hope Street
 26 Los Angeles, California 90071-2899
 27 Telephone: (213) 430-6000
 28 Facsimile: (213) 430-6407
 Email: dsestito@omm.com
 mcowan@omm.com

26 KIMBERLY BRANSOME (SBN 255480)
 27 PAUL, WEISS, RIFKIND, WHARTON &
 28 GARRISON LLP
 29 2029 Century Park East, Suite 2000
 Los Angeles, CA 90067-3006
 Telephone: (310) 982-4350

1 Facsimile: (310) 943-1748
2 Email: kbranscome@paulweiss.com

3 *Attorneys for Defendant Exxon Mobil*
4 *Corporation*

5 PURSUANT TO STIPULATION, IT IS
6 SO ORDERED.

7 The Honorable Richard Seeborg
8 United States District Judge

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